

COASTAL CONSERVANCY

Staff Recommendation

February 2, 2017

**Iron Triangle Urban Greening Project**

Project No. 16-044-01

Project Manager: Avra Heller

**RECOMMENDED ACTION:** Authorization to disburse up to \$500,000 to the City of Richmond to implement a multi-benefit urban greening project in the City's Iron Triangle neighborhood.

**LOCATION:** Iron Triangle Neighborhood, City of Richmond, Contra Costa County.

**PROGRAM CATEGORY:** San Francisco Bay Area Conservancy

---

**EXHIBITS**

Exhibit 1: [Project Location Maps](#)

Exhibit 2: [Project Low Impact Development Locations](#)

Exhibit 3: [CEQA Documents](#)

Exhibit 4: [Project Letters](#)

---

**RESOLUTION AND FINDINGS:**

Staff recommends that the State Coastal Conservancy adopt the following Resolution pursuant to Sections 31160-31165 of the Public Resources Code:

“The State Coastal Conservancy hereby authorizes the disbursement of an amount not to exceed five hundred thousand dollars (\$500,000) to the City of Richmond (City) to implement an urban greening project in the City's Iron Triangle neighborhood (the project), subject to the following conditions:

1. The project shall not commence and no Conservancy funds shall be disbursed for the project until the Executive Officer of the Conservancy has reviewed and approved in writing:
    - a. A project work program, budget, and schedule.
    - b. A sign plan that acknowledges funding from the Conservancy.
    - c. Documentation that the City has obtained all permits and approvals required for the project under federal, state, and local law.
    - d. Documentation that the City of Richmond has entered into a formal agreement with the Trust for Public Lands (TPL) for the management of this project.
-

Staff further recommends that the Conservancy adopt the following findings:

“Based on the accompanying staff report and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed project is consistent with Chapter 4.5 of Division 21 of the Public Resources Code, regarding the resource goals of the San Francisco Bay Area Conservancy Program.
  2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
  3. The Conservancy has independently reviewed and considered the *Richmond Greenway Initial Study/ Mitigated Negative Declaration* adopted by the City of Richmond in May 2004 and the *Addendum Initial Study/ Mitigated Negative Declaration Richmond Unity Park* adopted by the City of Richmond on April 4, 2013 (collectively “MND”) and has concluded that there is no substantial evidence that the components of the proposed project addressed in the MND, as mitigated, will have a significant effect on the environment.
- 

### **PROJECT SUMMARY:**

The Iron Triangle Urban Greening Project, in the City of Richmond (City), consists of two primary components. The first involves planting over 270 street trees through-out a 66.8-acre project area to reduce the urban heat island effect by enhancing canopy cover to about 40%, increasing carbon sequestration, and improving air quality. The second component of this project involves installing 6,478 square feet of low impact development (LID) enhancements such as bioswales and rain gardens to reduce the impacts of localized flooding events, and filter toxic chemicals and heavy metals from the surrounding environment. LID features will be installed along the north side of Unity Park (a \$5,000,000 four-block project segment of the Richmond Greenway, which is currently under construction). The project will make the City’s Iron Triangle neighborhood more walkable and increase the public’s use of the developing Richmond Greenway, which is a pedestrian-bicycle trail and park along a former rail line. The project will make the City’s open spaces more available to a historically disenfranchised community. Increased walkability may also have community health benefits, and decrease carbon emissions by reducing the need to drive.

The City will implement the project in partnership with three key nonprofit organizations, The Trust for Public Land (TPL), The Watershed Project (TWP), and Groundwork Richmond (GWR). The organizations’ various roles are as follows: The City is the property owner of the public right-of-way in which the work will take place, in charge of design review, permitting, and environmental review. TPL will be the Project Director for the scope of this grant, including grant administration, partner coordination, and project management for the City (a written agreement will guide this partnership). TPL is currently serving in this role on another green infrastructure project on the Greenway of a comparable scale with the same partners. GWR is the implementation partner for street tree planting, establishment and stewardship; and TWP is the implementation partner for LID features, monitoring and stewardship.

- TPL, a national nonprofit, will help the City to manage and implement the project, and serve as the lead coordinator between the Conservancy, the City, TWP and GWR. TPL has a long history of working with under-resourced communities and with vulnerable populations and through the years has assisted the City with various parks, greenway, and schoolyard development projects. The City is currently partnering with TPL on a Climate Smart program to develop a plan for climate resilience.
- Groundwork Richmond (GWR), a local nonprofit, will perform outreach and community engagement related to street tree planting, coordinate species selection in accordance with the Urban Greening Master Plan, procure trees, develop maintenance agreements with property owners, conduct training for volunteer planting activities, and oversee tree planting and watering. GWR will coordinate pavement removal and repair with the City. GWR will identify and inventory all planted trees, update the City's iTree inventory, and maintain trees for two years until established. Prior to planting, property owners will sign agreements with GWR accepting responsibility for watering and maintenance of the street trees in front of their properties which are on city streets, after the two-year establishment period under GWR's care. Additionally, Groundwork staff follow trees to ensure residents are caring for trees and if not, they will provide maintenance.
- The Watershed Project (TWP) will be the party responsible for the installation of the vegetated swales and rain gardens. TWP will work with the City to develop a long-term Management and Monitoring Plan for all of the LID components of this project that assesses their effectiveness to (1) reduce or manage flows; (2) infiltrate diverted flows; (3) remove pollutants of concern. TWP will monitor and maintain the LID features and monitor plant establishment (replanting as needed), erosion, and functioning of bioswales. The organization will also evaluate water quality before and after installation of bioswales, monitoring quality of runoff entering storm drains pre-installation and for two rainy seasons post-installation. TWP's healthy watershed programs will provide ongoing community education and outreach, including watershed tours highlighting this project as a model for new projects. TWP has been leading monthly volunteer days on the Greenway since 2007.
- The City will work with the project partners in the various ways elaborated upon above, as well as providing maintenance for all LID features after TWP's 2-year maintenance commitment expires. The City will provide all necessary permits, and serve as the primary grant recipient for this project.

This project is occurring in conjunction with and will leverage a variety of other state-funded projects working to convert brownfields to parks along the Richmond Greenway. Key associated projects which are in various phases of development at this time include the 1. \$5,000,000 Unity Park project; "Greening the Last Mile", 2. a connection point to the western section of the Richmond Greenway, 3. Harbour-8 Park, a two-block segment of the Richmond Greenway, 4. the Richmond Greenway 2<sup>nd</sup> to Garrard / West End Gap Closure; and 5. the Yellow Brick Road Walkable Neighborhood Plan: Mathieu Court Alley Greening Project, a "green alley" project in Richmond that will replace impervious paving with native plant landscaping, raingardens, and pervious pavers. Funding sources for these associated projects include grants from the Strategic Growth Council's Urban Greening Program, the Statewide Park Program, and Caltrans' Active Transportation Program.

**Site Description:** The proposed project is located in the Iron Triangle neighborhood in central Richmond, California, on the San Francisco Bay. Once a vast wetland ecosystem, central Richmond is now a highly-urbanized watershed isolated from the rich regional parks and open space at the perimeter of the city. With a population of approximately 104,000, Richmond has an unemployment rate of 9.2% with more than 30% of the population living below the poverty line. The Iron Triangle is bounded by heavy industry (including an oil refinery) and major regional shipping and transportation corridors (I-80, I-580, and railway freight lines). As a result of decades of major industrial activity in the immediate vicinity of the proposed project, Iron Triangle residents suffer from some of the highest rates of cancer, asthma, heart disease, diabetes, and premature birth in the state.<sup>1</sup> The total Project area, bounded by MacDonald Ave on the north, Carlson Avenue on the east, the Richmond Greenway on the south, and Marina Way on the west, is 66.8 acres. (See Exhibit 1 for close up of project location.) The project is adjacent to the Unity Park Project which is expected to be completed in August 2017.

The 3-mile “Richmond Greenway,” a former railway that was converted to a regional trail, today connects disadvantaged communities in the Iron Triangle, improving access and equity to these natural resources. Through its conversion to a bicycle and pedestrian path, the Richmond Greenway now connects central Richmond to vast regional open spaces and park resources, as well as to the regional trail system, such as the 550-mile Bay Area Ridge Trail and the 500-mile Bay Trail. In addition to connecting the park-poor Richmond community to regional open space areas by improving conditions on the Greenway, the Project will enhance the overall watershed by protecting water quality. Though the Greenway itself is nearing 75% completion, broader connections to it and enhancements to its adjacent native plant cover, urban canopy, and water resources are sorely needed.

**Project History:** This project was brought to the Conservancy’s attention through the City’s application to Proposition 1 Grant Round 3. It is directly related to a \$45,000 grant authorized by the Conservancy on February 27, 2003, to fund Rails-to-Trails support of the City to produce technical studies and final design plans for the Richmond Greenway (which this project is physically adjacent to). When completed, the Richmond Greenway will run along the former Santa Fe railroad corridor, connecting the San Francisco Bay Trail on the west, to the Ohlone Greenway in El Cerrito to the east. The Conservancy is also funding a \$202,206 grant to The Watershed Project (a key implementation partner on the proposed project) to conduct the “Booker T. Bioswales: Beads on a Green Necklace” urban greening project in Booker T. Anderson Jr. Park in Richmond. As described above there are six other concurrent Richmond Greenway projects at various stages of development. The total funding for these related projects is over \$12,000,000 with funding from various sources including Caltrans Environmental Justice Transportation Grants, its Active Transportation Program, the Strategic Growth Council’s Urban Greening Program, and Department of Parks and Recreation’s Statewide Park Program awards.

---

<sup>1</sup> Pacific Institute, Measuring What Matters, 2009. <http://pacinst.org/publication/measuring-what-matters/>

**PROJECT FINANCING**

<b>Coastal Conservancy</b>	\$500,000
<b>Project Total</b>	<b>\$500,000</b>

The expected source of funding for this \$500,000 authorization is the fiscal year 2016/17 appropriation to the Conservancy from the “Water Quality, Supply, and Infrastructure Improvement Act of 2014” (Proposition 1, Division 26.7 of the Water Code, § 79700 et seq.). Funds appropriated to the Conservancy derive from Chapter 6 (commencing with Section 79730) and may be used “for multi-benefit water quality, water supply, and watershed protection and restoration projects for the watersheds of the state” (Section 79731). Section 79732(a) identifies the specific purposes of Chapter 6, of which the following pertain to this project: subsection (a)(11): reduce pollution or contamination of rivers and streams, and protect or restore natural system functions that contribute to water supply, water quality, or flood management; and subsection (a)(9): protect and restore urban watershed health to improve watershed storage capacity, protection of life and property, stormwater resource management and greenhouse gas reduction.

As required by Proposition 1, the proposed project provides multiple benefits and will help achieve the above-referenced Chapter 6 purposes. By installing the proposed bioswales and rain garden, using drought tolerant Bay-friendly landscaping, the project will help absorb and treat a 5.44-acre drainage area. The planting of 277 street trees will reduce the urban heat island effect, by increasing shade cover of the public right of way to approximately 40%. The trees are also expected to provide a combined 7.7 tons of carbon storage per year at maturity. This project will make an urban area more inviting and walkable, and will increase the public’s access to native vegetation and open space.

The proposed project was selected through the third-round competitive grant process under the Conservancy’s Proposition 1 Grant Program Guidelines adopted in June 2015 (see § 79706(a)). The proposed project meets each of the evaluation criteria in the Proposition 1 Guidelines as described in further detail in this “Project Financing” section, the “Project Summary” section and in the “Consistency with Conservancy’s Project Selection Criteria & Guidelines” section of this report.

Additionally, an estimated \$42,000 will be contributed as in-kind staff time from the Trust for Public Land and Groundwork Richmond, for project administration and management over the course of the project’s two-year timeline.

**CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:**

The proposed project would be undertaken pursuant to Chapter 4.5 of the Conservancy’s enabling legislation, Public Resource Code Sections 31160-31165, which states that the Conservancy may award grants in the nine-county San Francisco Bay Area to help achieve the goals of the San Francisco Bay Area Conservancy Program. The proposed project is located in Contra Costa County, one of the nine San Francisco Bay Area counties. The following goals of the San Francisco Bay Area Conservancy Program are achieved by this proposed project:

Section 31162(b), which authorizes the Conservancy to “protect, restore, and enhance natural habitats and connecting corridors, watersheds, scenic areas, and other open-space resources of regional significance [within the SF Bay Area].” This project will restore and enhance an urban watershed.

Section 31162(d), which authorizes the Conservancy to award grants to “promote, assist, and enhance projects that provide open space and natural areas that are accessible to urban populations for recreational and educational purposes.” This project will enhance a public open space that is easily accessible by the residents of the City of Richmond and nearby communities for recreational and educational purposes.

Section 31163(b), which authorizes the Conservancy to award grants to “support interagency actions and public/private partnerships in the San Francisco Bay Area ...providing for broad-based local involvement in, and support for, the San Francisco Bay Area Conservancy Program.” This project involves a wide variety of public and private stakeholder engagement in linking urban communities to significant public trails, as well as improving SF Bay watershed functions.

Section 31163(c), which mandates that the Conservancy use specific criteria to develop priority projects within the San Francisco Bay Area Conservancy Program. The project meets the selection criteria under 31163(c), in that it: 1) is supported by adopted local or regional plans, including the *Richmond Climate Action Plan*, the *City of Richmond’s Parks and Landscaping Plan*, *City of Richmond Urban Greening Master Plan*, and the *Richmond Greenway Master Plan*; 2) serves a regional constituency in enhancing a park and trail resource of regional significance; 3) can be implemented in a timely way, with partners with the necessary expertise, CEQA completed, and basic design plans scoped and ready for the next design phase; 4) provides opportunities or benefits that could be lost if the project is not implemented quickly, in that the project is happening in concurrence with a variety of Richmond Greenway projects that will have integrated benefits; and 5) includes matching funds - in addition to the estimated \$42,000 in-kind match that will be contributed to this project in the form of TPL staff hours, this project leverages extensive planning and concurrent Richmond Greenway work (as elaborated upon above).

**CONSISTENCY WITH CONSERVANCY’S 2013 STRATEGIC PLAN  
GOAL(S) & OBJECTIVE(S), AS REVISED JUNE 25, 2015:**

**Goal 11F:** The project enhances watershed functions and will improve water quality in a watershed feeding into the San Francisco Bay.

**Goal 12I:** The project is part of the construction of the Unity Park, a piece of the Richmond Greenway, which when completed will serve as a connection between urban areas and the San Francisco Bay Trail, a regionally significant trail.

**CONSISTENCY WITH CONSERVANCY’S  
PROJECT SELECTION CRITERIA & GUIDELINES:**

The proposed project is consistent with the Conservancy’s Project Selection Criteria and Guidelines, last updated on October 2, 2014, in the following respects:

**Required Criteria**

1. **Promotion of the Conservancy’s statutory programs and purposes:** See the “Consistency with Conservancy’s Enabling Legislation” section above.
2. **Consistency with purposes of the funding source:** See the “Project Financing” section above.
3. **Promotion and implementation of state plans and policies:** Project is consistent with, and supports the goals and intended outcomes of the following state and local plans:
  - *California @ 50 Million: The Environmental Goals and Policy Report* - The project is consistent with two of the Pillars of California @ 50 Million: Reducing emissions of short-lived climate pollutants and stewarding natural resources to ensure that they store carbon and are resilient to climate change. It supports the key strategies identified in the report to: build a resilient and sustainable water system; steward and protect natural and working landscapes; incorporate climate change adaptation into all planning and investment; and lead by example to make the state a model for long-term sustainability.
  - *CA Climate Adaptation Strategy/Safeguarding California: Reducing Climate Risk Plan* - The project is aligned with the overall goal of Safeguarding California, to reduce impacts and prepare for climate risks. The Health Implementation Plan of the Safeguarding California Plan specifically identifies urban greening as a strategy to reduce the impacts of extreme heat events and heat islands. The green infrastructure component of the project is also consistent with the Land Use and Community Development Implementation Plan as well as the Water Implementation Plan.
  - *Bay Area Integrated Regional Water Management Plan (IRWMP)* - The project is consistent with the Bay Area Integrated Regional Water Management Plan (IRWMP) and the City is committed to coordinating and improving water supply reliability, protecting water quality, managing flood protection, maintaining public health standards, protecting habitat and watershed resources, and enhancing the overall health of the Bay.
  - *Comprehensive Conservation and Management Plan (2007) for the San Francisco Estuary* - The project will fulfill many of the goals in this plan: treat urban runoff at its source to “enhance resiliency and reduce pollution in the Estuary and its watersheds;” promote stormwater BMPs and guidelines for site planning; and increase participation, support, and incentives to economically disadvantaged and culturally diverse communities to protect and restore the Estuary and its watersheds.
4. **Support of the public:** This project has received broad public support, including support from the Richmond City Council, Richmond Division of Parks and Landscaping, the Trust for Public Lands, Groundwork Richmond, The Watershed Project, and Friends of the Richmond Greenway. See “Project Letters,” Exhibit 4.
5. **Location:** The project is located in the City of Richmond in Contra Costa County, within the jurisdiction of the San Francisco Bay Area Conservancy Program.

6. **Need:** The Conservancy’s funding provides the final piece of the budget and allows the project to move forward.
7. **Greater-than-local interest:** This project reduces disparities in access to natural areas, improves water quality entering the San Francisco Bay, and reduces the urban heat island effect while increasing carbon sequestration, within a disadvantaged urban community.
8. **Sea level rise vulnerability:** The project site and surrounding neighborhood are not located directly in an area affected by a projected 1.4-meter sea level rise, but are historic wetlands and part of a coastal zone community that is vulnerable to the secondary impacts of rising sea levels and associated floods. Eastern Contra Costa County has a population of 5,800 people that would be affected by a 100-year storm event with a 1.4-meter sea level rise.<sup>2</sup> Shallow groundwater is found locally – in some places the water table can be only 5” from surface grade during the rainy season – which may be exacerbated in the future by increasing sea levels and more intense storms. The project’s design anticipates and attempts to ameliorate these issues.

### **Additional Criteria**

11. **Resolution of more than one issue:** This project reduces the impacts (and expected increased impacts due to climate change) of localized flooding events through the installation of low impact development (LID) enhancements. LID stormwater projects such as bioswales, in addition to serving as flood management, will help to filter out toxic chemicals and heavy metals from the surrounding industrial environment. The tree planting aspects of this project will serve to increase canopy cover in the neighborhood to about 40%, simultaneously serving as carbon sinks, and reducing the urban heat island effect. All of these green infrastructure developments will serve to make the Iron Triangle neighborhood more walkable, and make natural spaces readily available to a historically disenfranchised community. Increased walkability will in turn improve the community’s health, and decrease carbon emissions by reducing the need to drive.
12. **Leverage:** See the “Project Financing” section above.
13. **Innovation:** This project is innovative in that the green infrastructure solutions will reference historical landscape ecology and current site conditions to mimic adaptation features specifically suited to local constraints, including soils, hydrology, budget, climate, drought, and limited maintenance. For example, trees will be selected for the greatest likelihood of success for providing continuous canopy cover with the least energy expenditure.
14. **Readiness:** A portion of this project is part of the City of Richmond’s ongoing Unity Park project, which is an extension of the Richmond Greenway. CEQA analysis for the Unity Park project was completed in 2013 and necessary permits will be pursued once LID designs have been finalized. TPL, who will be managing the proposed project, has a long history of working with under-resourced communities and with vulnerable populations and has been coordinating with the City to implement various other parks, greenway, and schoolyard development projects. Richmond is currently partnering with TPL on a Climate Smart

---

<sup>2</sup> [http://www.pacinst.org/wp-content/uploads/2009/02/Fig16\\_Population\\_Inundation\\_CA.pdf](http://www.pacinst.org/wp-content/uploads/2009/02/Fig16_Population_Inundation_CA.pdf)

program to plan for greater climate resilience. Groundwork Richmond and The Watershed Project are also working on concurrent and complimentary urban greening projects and are ready and well suited to participate in the success of this project.

15. **Realization of prior Conservancy goals:** “See “Project History” above.”
16. **Return to Conservancy:** See the “Project Financing” section above.
17. **Cooperation:** The proposed project is a partnership between the City, Trust for Public Land (TPL), Groundwork Richmond (GWR), and the Watershed Project (TWP). The City is the property owner of the public right-of-way in which the work will take place, in charge of design review, permitting, and environmental review. TPL will be the Project Director for the scope of this grant, including grant administration, partner coordination, and project management for the City (a written agreement will guide this partnership). TPL is currently serving in this role on another green infrastructure project on the Greenway of a comparable scale with the same partners. GWR is the implementation partner for street tree planting, establishment and stewardship; and TWP is the implementation partner for LID features, monitoring and stewardship.
18. **Vulnerability from climate change impacts other than sea level rise:** Dense urban portions of Richmond are projected to experience a 4-4.5 °F temperature increase by 2040–2060. This will directly subject urban residents to increased heat stress. The Iron Triangle neighborhood’s high density dwelling units and critical lack of permeable surfaces and tree canopy coverage exacerbate the urban heat island effect, which will only worsen with the anticipated increases in temperature resulting from climate change. Higher temperatures and impacts on air quality can negatively affect public health. This is particularly significant to the proposed Project site, as the neighborhood already suffers from higher-than-average pollution levels. Diesel particulate matter per square mile in Richmond is 40 times higher than the statewide average.<sup>3</sup>

The Project will plant 277 street trees to provide urban heat island mitigation, and increase tree canopy in the project area from less than 10% to approximately 40% coverage. Planted trees will increase greening and tree canopy cover, sequester GHGs, and remove particulate matter from the air. Plants for the bioswales have been chosen based on their ability to survive both drought and flood conditions and thus be resilient to climate change impacts. Plant survival will be monitored and plants replaced as needed. In addition, increasing the walkability of the neighborhood will reduce the need for car trips, reducing GHG emissions.

Outmoded stormwater infrastructure in the Iron Triangle neighborhood is currently incapacitated by increased rain events because the heavy clay soils, large amount of paving, and high water table, inhibit infiltration. Urbanization of the watershed and the elevation of the Greenway (formerly a railroad bed) in respect to the surrounding topography causes localized flooding at the adjacent street ends on the Greenway. The project addresses this vulnerability by incorporating green infrastructure improvements that will alleviate localized flooding associated with the outdated or non-existent stormwater infrastructure.

19. **Minimization of greenhouse gas emissions:** The Project will result in temporary construction impacts, including greenhouse gas (GHG) emissions, caused by transporting the

---

<sup>3</sup> Community Health and Wellness: City of Richmond General Plan Element 11, page 11.

construction equipment, trees, and plants to the site. Since TWP plans to grow much of the vegetation in its own nursery (less than a mile from the site), those emissions will be minimal. Carbon sequestration will increase as these plants and trees mature.

The planting of 262 street trees and 15 trees on the Greenway will help to sequester carbon and reduce heat island impacts, cooling adjacent homes and reducing energy consumption. In addition, the project will contribute to making the Richmond Greenway a safer and more pleasant path, increasing active transit and resulting in reduced vehicle miles travelled (VMT) and reduced GHG emissions.

### **COMPLIANCE WITH CEQA:**

The tree planting component of the proposed project is exempt from CEQA. The component of the proposed project that entails installation of LID features along Unity Park is part of a larger project that is the subject of a mitigation negative declaration. Compliance of these two project components with CEQA is discussed separately below.

#### Tree Planting

The planting of 277 trees in the public right-of-way in the City's Iron Triangle neighborhood is categorically exempt from CEQA pursuant to 14 Cal. Code Regs. Section 15304, which exempts minor alterations in the condition of land that does not involve the removal of healthy, mature, scenic trees. Section 15304(b) and (e) identify new landscaping and minor trenching and backfilling as specific examples of minor alterations that qualify for the exemption. The proposed project will entail removal of existing concrete followed by planting of trees in City rights-of-way across a 66.8-acre area. No existing trees will be removed. Thus, this component of the proposed project is exempt as the minor alteration of the City's rights-of-way.

#### Low Impact Development

In May 2004, the City adopted the *Richmond Greenway Initial Study/ Mitigated Negative Declaration* and associated mitigation monitoring and reporting program, and on April 4, 2013, the City approved the *Addendum Initial Study/ Mitigated Negative Declaration Richmond Unity Park*, (collectively the "MND") determining that addition of Unity Park to the Richmond Greenway project would not present new or substantially more severe significant effects and that no additional mitigation measures were required. The low impact development component of the proposed project is a small part of the overarching Richmond Greenway project addressed in the MND. The MND indicates that this component of the proposed project will not have a significant effect on the environment with the incorporation of certain mitigation measures. The potential effects, for which mitigation is proposed, are in the areas of soil quality / toxicity, cultural resources, geology and soils, and water quality. The potential effects on soil quality/toxicity, cultural resources, geology and soils, and erosion control will be mitigated by the following mitigation measures:

- The City of Richmond will hire a qualified contractor to prepare a site-specific Soil Management Plan with a Health and Safety Plan (SMP/HSP). The SMP/HSP will establish soil management and control specifications for excavation, grading, and construction activities, including procedures for evaluation of soil disposal options, and health and safety provisions for monitoring the exposure of construction workers to contaminants. The Plan will be submitted to the City of Richmond for review and approval. The City will review and approve the Plan and implement the recommended soil management and control specifications.
- The City will prepare and implement an erosion control plan that will include the use of biodegradable and non-biodegradable erosion control fabrics, mulch, and other best management practices to protect exposed surfaces. The plan will also include the construction of collection and discharge surface water flow devices as appropriate.
- Trees will be planted in clean, imported soil that extends to the expected width and depth of the mature tree roots. The soil will be obtained from a commercial source of residential garden soil.
- If an archeological artifact is found during project construction, work will cease and a qualified archeologist will evaluate the artifact, and make recommendations about treatment. Only artifacts that meet the CEQA definition of a historical or unique archaeological resources will be protected.
- If human remains are found, work will stop within 50 feet of the find and the Contra Costa County Coroner will be notified. If the remains are of Native American origin, the Coroner will notify the Native American Heritage Commission, which will identify a Native American Most Likely Descendent to inspect the site and provide recommendations for the proper treatment of the remains.

Conservancy staff has independently reviewed the MND and recommends that the Conservancy, as a responsible agency, find that there is no substantial evidence that the low impact development component of the proposed project, as mitigated, may have a significant effect on the environment. Staff will file a Notice of Determination upon approval of the project.